

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION**

TONYA CHERYL MOSES

Plaintiff,

VS.

**ALLSTATE INDEMNITY COMPANY,
EDDIE WATTS, DEXTER WALDEN**

Defendants.

CIVIL ACTION NO.: 3:06CV154-DRB

REPORT OF PARTIES' PLANNING MEETING

1. Pursuant to Fed.R. Civ. P. 26(f), a meeting was held by telephone, at Huie, Fernambucq & Stewart, L.L.P. and was attended by:

Christina D. Crow, on behalf of Plaintiff, TONYA CHERYL MOSES

Thomas E. Bazemore, III on behalf of Defendants ALLSTATE INDEMNITY COMPANY
and EDDIE WATTS.

Clifton E. Slaten, on behalf of Defendant DEXTER WALDEN.

2. **PRETRIAL DISCOVERY DISCLOSURES:** The parties will exchange by May 1, 2006 the information required by Rule 26.1(a)(1).

3. **DISCOVERY PLAN.** The parties jointly propose to the Court the following discovery plan:

Discovery will be needed on the following subjects:

PLAINTIFFS:

Defendant's reason for denying full coverage of Plaintiffs' loss.

DEFENDANTS:

Plaintiff's allegations against Allstate.

Plaintiff's evidence of damages.

All discovery commenced in time to be completed by December 1, 2006.

Maximum of 30 interrogatories by each party to any other party. Responses due 30 days after service.

Maximum of 25 request for admissions by each party to any other party. Responses due 30 days after service.

Maximum of 30 requests for production by each party to any other party. Responses due 30 days after service.

Maximum of 4 depositions for Plaintiff and 4 depositions for Defendants.

Reports from retained experts under Rule 26(a)(2) shall be due from the Plaintiff on or before August 1, 2006 with Plaintiff's experts to be deposed before September 1, 2006. Reports from Defendants' experts under Rule 26(a)(2) shall be due on or before October 1, 2006 with Defendants' experts to be deposed on or before November 1, 2006. Supplementations under Rule 26(e) November 15, 2006.

4. OTHER ITEMS:

The parties do not request a conference with the Court before entry of the Scheduling Order. Plaintiff should be allowed until May 1, 2006 to add additional parties and to amend pleadings. Defendants should be allowed until June 1, 2006 to join additional parties and to amend pleadings.

All dispositive motions should be filed by December 15, 2006.

Settlement cannot be realistically evaluated prior to the close of discovery.

The parties request a final pretrial conference in December 2006.

Final lists of trial evidence under Rule 26(a)(3) should be due:

From Plaintiff and Defendant 20 days before trial; exhibits 20 days before trial.

The parties should have 7 days after service of final lists of trial evidence to list objections under Rule 26(a)(3).

The case should be ready for trial by January 2007. Expected length of trial is 4 days.

DATE: March 27, 2006.

Respectfully Submitted,

s/Gordon J. Brady, III, Esq.
s/Thomas E. Bazemore III, Esq.
s/Gordon J. Brady, III, Esq.
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